

1 Morgan E. Pietz (SBN 260629)
2 THE PIETZ LAW FIRM
3 3770 Highland Ave., Ste. 206
4 Manhattan Beach, CA 90266
5 mpietz@pietzlawfirm.com
6 Telephone: (310) 424-5557
7 Facsimile : (310) 546-5301

8 Attorney for Putative John Doe

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 INGENUITY 13, LLC, a Limited Liability
12 Company Organized Under the Laws of the
13 Federation of Saint Kitts and Nevis,

14 Plaintiff,

15 v.

16 JOHN DOE,

17 Defendants.

Case Number(s): 2:12-cv-08333-DMG-PJW

Assigned to: Judge Dolly M. Gee
Referred to: Magistrate Judge Patrick J.
Walsh

**DECLARATION OF MORGAN E.
PIETZ**

[No Hearing Requested]

1 I, Morgan E. Pietz, have personal knowledge of the facts alleged herein and hereby declare
2 as follows:

3 1. I am an attorney duly licensed by and in good standing with the State Bar of
4 California, and am admitted to the practice of law in the State and Federal Courts of the
5 State of California.

6 2. I am the attorney principally responsible for the representation the Putative
7 John Doe in the above-entitled action. My client wishes to remain anonymous for now,
8 however, his true identity and contact information are known to me. My client received a
9 letter from his IPS, Verizon, a few weeks ago, explaining that Ingenuity 13, LLC, an entity
10 organized in the Federation of Saint Kitts and Nevis, had filed a lawsuit, and issued a
11 subpoena seeking my client's identity. My client pays the Internet bill for an account that
12 was assigned an IP address which was purportedly used to illegally download plaintiff's
13 pornographic content.

14 3. Attached hereto as Exhibit A is a true and correct copy of my attempts to
15 meet and confer with plaintiff's counsel, Brett Gibbs, via email regarding obtaining an
16 extension in this matter. Mr. Gibbs promised to get back to me by Wednesday, November
17 28, but as of 8:00 p.m. on that day he had not done so.

18
19 I declare under penalty of perjury under the laws of the United States of America
20 that the foregoing is true and correct.

21
22 Executed on November 28, 2012, at Manhattan Beach, California.

23
24 /s/ Morgan E. Pietz

25 Morgan E. Pietz, Declarant